

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	No.: 16-cr-10305-NMG
)	
MARTIN GOTTESFELD)	

MOTION FOR LEAVE TO WITHDRAW

At the request of defendant Martin Gottesfeld (“Mr. Gottesfeld”), undersigned counsel hereby files this motion for leave to withdraw. As grounds, an “irretrievable breakdown in communication” between client and attorney has occurred. At Mr. Gottesfeld’s request, counsel attaches a letter concerning this matter as Exhibit A to this motion.

As noted in Exhibit A, Mr. Gottesfeld “has made it clear to [his] counsel that [he does] not consent to [counsel] making any further filings except to move to withdraw from his representation in this matter.” As the Court is aware, counsel’s opposition to the government’s motion *in limine* (Dkt. No. 116) is scheduled to be filed today. However, in light of Mr. Gottesfeld’s stated lack of consent to “any further filings” by counsel, and these circumstances generally, counsel will not be filing an opposition at this time.

Mr. Gottesfeld respectfully requests a hearing on this motion as soon as possible so that the matter of representation, and the related matter of filing the opposition, may be addressed. Undersigned counsel is available on 06/04 (all day); 06/05 (9am-1pm); 06/06 (9am-1pm); 06/11 (all day); 06/12 (all day); and 06/13 (3:00 pm).

Respectfully submitted,
MARTIN GOTTESFELD
By his attorney:

/s/ David J. Grimaldi

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DATE: June 1, 2018

CERTIFICATE OF SERVICE

I, David J. Grimaldi, hereby certify that true copies of this filing were served on all registered participants in this matter via ECF this 1st day of June, 2018.

/s/ David J. Grimaldi

David J. Grimaldi